U. S. DEPARTMENT OF ENERGY WORK BREAKDOWN STRUCTURE DICTIONARY PART II - ELEMENT DEFINITION

1. PROJECT TITLE/PARTICIPANT		2. DATE	3. IDENTIFICATION NUMBER	
Environmental Management/Bechtel Jacobs		10/01/02	DE-AC05-98OR22700	
Company LLC				
4. WBS ELEMENT CODE		5. WBS ELEMENT TITLE		
04.01.01.26		PAD Scrap N	⁄letal	
6. INDEX LINE NO. 7. REVISION		NO. AND AU	JTHORIZATION	8. DATE
N/A	Rev 1			01/23/03
9. APPROVED CHANGES				
N/A				
10. SYSTEM DESIGN DESCRIPTION			11. BUDGET AND REPORTING	
N/A			NUMBER	
			N/A	

12. ELEMENT TASK DESCRIPTION

WBS GRAPHIC

See attached

INTRODUCTION

As a result of numerous uranium process (cascade) upgrades, approximately 54,000 tons of scrap material was relocated to the northwest corner of the PGDP for disposition. These programs included dismantlement, removal, and onsite storage of contaminated equipment, cell components, and scrap metal from the cascade facilities. The metal surfaces of much of the PGDP scrap inventory is contaminated with compounds derived from uranium hexafluoride feedstock. The objective of this project is to disposition the scrap as a non-time critical removal action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to reduce or remove potential risk and hazards to PGDP personnel, off-site individuals, and the environment from exposure to materials at or potentially migrating from deteriorating scrap materials.

LOGIC RELATIONSHIPS:

Removal of the scrap is a prerequisite to future evaluations of burial grounds and removal of contaminated soils underlying the scrap yards.

SCOPE DESCRIPTION

Release Sites and Facilities

Assessments to be completed

None

Actions to be completed

RAIMS	SWMU No.	<u>Description</u>	
2681	7	C-747-A UF4 Drum Yard	
	6	C-747-B Contaminated Scrapyard	
2684	14	C-746-E Contaminated Scrapyard	
2684	14	C-746-E1 Contaminated Scrapyard	
2685	15	C-746-C Contaminated Scrapyard	
2685	15	C-746-C1 Contaminated Scrapyard	
2682	13	C-746-P Regulated Clean Scrapyard	

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2682	13	C-746-P1 Clear	n Excess Metal	Yard
2683	16	C-746-D Clas	C-746-D Classified Scrapyard	
		C-746-H4 Nick	el Ingot Scrapy	ard

Past Accomplishments

General Accomplishments:

- Completed the Small Mammal Study.
- Incorporated regulator comments and finalized scrap metal action memorandum.

<u>Infrastructure Accomplishments</u>:

- Completed design, issued subcontracts and constructed storm water collection basin and associated drainage ditches, and other ancillary infrastructure elements associated with the infrastructure for the scrap metal disposition project.
- Received approval of the Removal Action Work Plan for Infrastructure Fieldwork.
- Submitted D1 Operation and Maintenance plan for the northwest corner stormwater control facility.

Aluminum Ingot Accomplishments:

- Received approval of the Removal Action Work Plan for Aluminum Ingot Removal.
- Initiated loading activities for the disposal of the aluminum ingots at NTS.
- Performed sampling of buttons and incorporated results in NCSE.
- Submitted waste characterization profile to Nevada Test Site (NTS) for approval.

Scrap Metal Disposition Accomplishments:

- Evaluated proposals and awarded a subcontractor to perform scrap metal removal action.
- Received approval of the Removal Action Work Plan for Scrap Metal Disposition.
- Performed air quality air permit calculations for NESHAP and NRC regulatory compliance.
- Mobilized scrap metal disposition subcontractor and completed initial profile sampling.
- Completed nickel ingot building design for constructability review.
- Began scrap metal removal action on scrap piles.

C-746-D Scrapyard Accomplishments:

 Incorporated activities specific to the classified scrap yard removal action into the D2 Removal Action Work Plan for the Scrap Metal Disposition. Began planning activities for the waste containers and heavy equipment needed.

Future Accomplishments (through completion)

General Planned Accomplishments

Develop and submit draft and final versions of Scrap Metal Removal Post Construction Reports.

Infrastructure Planned Accomplishments:

- Prepare Post Construction reports for storm water collection basin, storm water drainage ditches, and trailer laydown area.

Aluminum Ingot Planned Accomplishments:

- Complete transport and disposal of the aluminum ingots, after NTS re-authorizes PGDP to make waste shipments. The aluminum ingot waste profile has already been approved by NTS.

Scrap Metal Disposition Planned Accomplishments:

- Complete scrap metal removal action on scrap piles.
- Complete baseline monitoring and continue compliance monitoring.
- Finalize drawings and construct nickel ingot storage building.
- Complete relocation of nickel ingots to storage building.

C-746-D Scrapyard Planned Accomplishments:

- Complete classified scrap metal removal action.

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Scope Summary

04.01.01.26.01 Technical Management and Integration

Technical Management and Integration activities include the technical, subcontract, and project management necessary to ensure that all activities in the WBS elements are completed on schedule, within budget, and without safety or environmental incident. Technical Management and Integration includes the Project Manager, Task Manager, Task Lead, Project Controls and other BJC personnel who will perform programmatic activities, project scheduling and estimating. Other Bechtel Jacobs Company support will be resource loaded in the individual WBS elements.

Baseline Change Proposals – Prepare BCP documentation to make necessary corrections to the baseline when scope, schedule, or cost changes are determined necessary.

Specific activities include:

- Maintain contact and open communications with the appropriate DOE Project Manager on the subproject
- Participate in technical information and monthly Project Status Review meetings to provide the DOE with project status summaries
- Respond and supply information to DOE for Lessons Learned, surveillance and audits, Site-Specific Advisory Board support, and other DOE reporting mechanisms.
- Maintain subproject estimates and estimates at completion.

04.01.01.26.02 Scrap Metal Removal Action and Design

An existing subcontract will be utilized to complete the aluminum ingot disposal that was initiated in prior FY's. The ingots will be transported and disposed of at NTS following resolution of DOE-NTS waste issues. The contractor will disposition the scrap under a non-time critical removal action. Non-classified scrap metal, except nickel ingots at C-746-H4, will be sorted, segregated, characterized, processed, containerized and transported for on-site and/or off-site disposition as appropriate. The nickel ingots will be placed in a storage area that will have a storage building constructed over them. The nickel ingots will be waiting future management options, including the potential for recycle. Construction reports will be prepared and completed. C-746-D scrap will be transported and disposed of at NTS.

Safety and Health Work Performance

It is the core value of Bechtel Jacobs Company that the safety and health of every worker and the public at large, and our environment, are the most important assets we are entrusted to protect. To accomplish this, an Integrated Safety Management System (ISMS), based on DOE's ISMS has been implemented that incorporates the five core functions and is based on the seven guiding principles. The objective of ISMS is to systematically integrate safety and environmental protection into the planning and execution of all work activities. The term safety encompasses Nuclear Safety, Industrial Safety, Industrial Hygiene, Occupational Health, Health Physics, and environmental issues. ISMS requirements flow-down to Bechtel Jacobs Company subcontractors. The Five Core Functions are: (1) Define the scope of work, (2) Analyze hazards, (3) Develop and implement hazard controls, (4) Perform work within controls, and (5) Provide feedback and continuous improvement. The Seven Guiding Principles are (1) Line Management Responsibility for Safety, (2) Clear Roles and Responsibilities, (3) Competence commensurate with responsibility, (4) Balanced Priorities, (5) Identification of Safety Standards and Requirements, (6) Hazard Control Tailored to Work Being Performed, and (7) Operations Authorization.

In performing the analysis of alternatives against the CERCLA nine criteria, consideration is given to the

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principles of ISMS. Specifically, in the analysis of "implementability" and "short-term impact", a trade-off assessment is performed to balance the risk to workers compared to the overall benefit of the project. This assessment follows the five core functions of ISMS to assure that the scope of work and the specific steps to carry out the project have been defined in sufficient detail to analyze the associated hazards, the effectiveness of the controls, and the actual risks to the workers.

Before a task within the scrap metal project begins, at least an Internal Field Review must be completed that demonstrates that all involved in the project have completed rigorous health and safety reviews and that all potential hazards of doing the work have been identified. The routine tasks in the project are conducted in accordance with standard operating procedures, activity hazard analyses, and Integrated Safety Management plans. Non-routine work will require a Internal Field Review as necessary to ensure complete health, safety, and environmental reviews prior to work start. This review is conducted by people, experienced in similar kinds of work, with the right to examine all aspects of a project about to commence, and require that the project team provide documented evidence that any applicable requirements of the job have been met.

REQUIREMENTS/DRIVERS

Bechtel Jacobs Company LLC Contract DE-AC05-98OR22700, December 18, 1997 Integrated Safety Management System Description, Bechtel Jacobs Company/OR-87, Revision 2 PGDP RCRA/HSWA Permit Number KY8-890-008-982 PGDP Site Management Plan, FY 01 Annual Revision, November 2000

As applicable, indicate other regulatory-related requirements:

CERCLA: Yes RCRA: Yes DNFSB: No DOE Orders: Yes AEA: No UMTRCA: No State: Yes Other: Y/N

WASTE VOLUMES

Please see attached waste performance metrics, as applicable

The waste quantities supporting the method of accomplishment and basis of estimate are consistent with data reported on the Waste Performance Metrics Form.

PROJECT SCHEDULE

Please see attached project summary schedule, project detail schedule, and Milestone Status Summary Report Schedule Assumptions:

EXECUTION YEAR BASELINE

Please see attached Budgeted Cost of Work Scheduled Plan

BASELINE BY YEAR

Please see attached Baseline by Year Report.